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Attorney for Defendant
CHRISTOPHER CROSS

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA


UNITED STATES OF AMERICA,)	Case No.: 4:15-cr-00266-HSG-3
)	
Plaintiff,)	STIPULATION ALLOWING MODIFICATION
)	OF TRAVEL RESTRICTIONS FOR
vs.)	CHRISTOPHER CROSS
)	
CHRISTOPHER CROSS,)	
)	
Defendant.)	
)	

Defendant Christopher Cross hereby respectfully requests permission of this court to modify the current travel restrictions that defendant shall not travel outside Northern District, so that defendant may travel to and throughout the Eastern Districts of California as well as a driver for the companies Uber and Lyft. Assistant United States Attorney, Garth Hire has been informed of this request and has no objections. In addition, Pretrial Services Officer Kalisi Kuto has been informed of this request and has no objections to the request.

Dated: December 16, 2015

_____/s/ Irvin L. Simons_____
Irvin L. Simons
Attorney for Christopher Cross

IT IS HEREBY ORDERED.


Honorable Haywood S. Gilliam, Jr.